UNITED STATES DISTRICT COURT	
EASTERN DISTRICT OF NEW YORK	
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CHEN XIA LIU and CHEN HUA LIU,	

Plaintiffs, Index No.: 20-cv-6369-FB-RER

-against-

HOK KWAI CHAU,
BO JIN ZHU,
WING FUNG CHAU, a/k/a ANDY CHAU,
SALENA CHAU,
TU KANG YANG,
MEI YANG KO,
WING FUNG HOME REALTY GROUP INC.,
WING FUNG CHAU D/B/A
WING FUNG REALTY GROUP

Defendants.	
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DEFENDANT TU KANG YANG'S NOTICE OF MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Tu Kang Yang, through his attorneys, Huang, Chen & Wu PLLC, respectfully moves to dismiss Plaintiffs claims against him under the Racketeer Influenced and Corrupt Organizations Act ("RICO") 18 U.S.C. §§ 1962(a), (c), and (d), and for other and further relief as the Court deems just and proper. In support, Defendant Yang submits Defendant Tu Kang Yang's Memorandum of Law dated April 30, 2021, which is being filed contemporaneously with this motion and the Affidavit of Tu Kang Yang, which is being filed contemporaneously with this motion.

Dated: April 30, 2021 Respectfully submitted,

Queens, New York By: <u>/S/ Xue Huang</u>

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Attorneys for Defendant Tu Kang Yang

Cc: all appearing parties (via ECF)